

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

IN RE: § **CASE NO. 25-30155**

ALLIANCE FARM AND RANCH, LLC, § (CHAPTER 11)

DEBTOR

IN RE: § **CASE NO. 25-31937**

ALLIANCE ENERGY PARTNERS, LLC, § (CHAPTER 11)

DEBTOR

JOINTLY ADMINISTERED

DEBTOR ALLIANCE FARM AND RANCH, LLC MOTION TO DISMISS CASE

NOTICE PURSUANT TO LOCAL RULE 9013-1

THIS MOTION SEEKS AN ORDER THAT MAY ADVERSELY AFFECT YOU. IF YOU OPPOSE THE MOTION, YOU SHOULD IMMEDIATELY CONTACT THE MOVING PARTY TO RESOLVE THE DISPUTE. IF YOU AND THE MOVING PARTY CANNOT AGREE, YOU MUST FILE A RESPONSE AND SEND A COPY TO THE MOVING PARTY. YOU MUST FILE AND SERVE YOUR RESPONSE WITHIN 21 DAYS OF THE DATE THIS WAS SERVED ON YOU. YOUR RESPONSE MUST STATE WHY THE MOTION SHOULD NOT BE GRANTED. IF YOU DO NOT FILE A TIMELY RESPONSE, THE RELIEF MAY BE GRANTED WITHOUT FURTHER NOTICE TO YOU. IF YOU OPPOSE THE MOTION AND HAVE NOT REACHED AN AGREEMENT, YOU MUST ATTEND THE HEARING. UNLESS THE PARTIES AGREE OTHERWISE, THE COURT MAY CONSIDER EVIDENCE AT THE HEARING AND MAY DECIDE THE MOTION AT THE HEARING.

REPRESENTED PARTIES SHOULD ACT THROUGH THEIR ATTORNEY.

TO THE HONORABLE UNITED STATES BANKRUPTCY JUDGE:

Alliance Farm and Ranch, LLC (“AFR”) hereby files this Motion to Dismiss Case and respectfully states the following:

1. AFR no longer wishes to prosecute this case. AFR's representative has instructed the undersigned counsel to request that this Court dismiss the AFR case. The declaration of the representative of AFR stating his reasons for dismissal is attached hereto as Exhibit "A".

WHEREFORE, AFR prays that this Court enter an order dismissing the AFR bankruptcy case; and that it be granted such other and further relief as the Court deems just and proper.

OKIN ADAMS BARTLETT CURRY LLP

By: /s/ Timothy L. Wentworth
Timothy L. Wentworth
Texas Bar No. 21179000
1113 Vine St., Suite 240
Houston, Texas 77002
Tel: 713.228.4100
Fax: 346.247.7158

**PROPOSED COUNSEL FOR ALLIANCE
FARM AND RANCH, LLC AND ALLIANCE
ENERGY PARTNERS, LLC**

CERTIFICATE OF SERVICE

I hereby certify that on May 21, 2025, a true and correct copy of the foregoing Motion was served via the Court's CM/ECF system and by United States First Class Mail to the parties listed on the attached service list.

By: /s/ Timothy L. Wentworth
Timothy L. Wentworth

Label Matrix for local noticing

0541-4

Case 25-30155

Southern District of Texas

Houston

Wed May 21 14:07:59 CDT 2025

ALLIANCE FARM AND RANCH, LLC

5450 Honea Egypt Rd

Montgomery, TX 77316-2364

Alliance Energy Partners, LLC

20008 Champions Forest Dr.

Suite 1203

Spring, TX 77379-8697

4

United States Bankruptcy Court
PO Box 61010
Houston, TX 77208-1010Alliance Energy Partners, LLC
5450 Honea Egypt Rd
Montgomery, TX 77316-2364

(p) KEAN MILLER LLP

ATTN ATTN LLOYD A LIM AND RACHEL K THOMPSON KUBAND
711 LOUISIANA STREET
SUITE 1800 SOUTH TOWER
HOUSTON TX 77002-2716Alliance Energy Resources LLC
c/o Idomeia Gibson
2700 Industrial Ln
Conroe, TX 77301-4072Amerisource Funding, Inc.
P.O. Box 4738
Houston TX 77210-4738Dustin Etter
c/o Noah E. W. Meek
Irelan McDaniel, PLLC
2520 Caroline, 2nd Floor
Houston, TX 77004-1000Erik and Darla Ostrander
20105 Krahn Rd.
Spring, TX 77388-4012Reagan H. 'Tres' Gibbs, III
Cokinos Young
1221 Lamar, 16th Floor
Houston, TX 77010-3039Timothy L. Wentworth
Okin Adams Bartlett Curry LLP
1113 Vine St., Suite 240
Houston, TX 77002-1044US Trustee
Office of the US Trustee
515 Rusk Ave
Ste 3516
Houston, TX 77002-2604United States Trustee's Office
515 Rusk St., Suite 3516
Houston, TX 77002-2604Deborah Louise Crain
E-Merger.Law
1334 Brittmoore Rd.
Suite 2314
Houston, TX 77043-4037Timothy L. Wentworth
Okin Adams, LLP
1113 Vine St., Suite 240
Houston, TX 77002-1044

The preferred mailing address (p) above has been substituted for the following entity/entities as so specified by said entity/entities in a Notice of Address filed pursuant to 11 U.S.C. 342(f) and Fed.R.Bank.P. 2002 (g)(4).

DrilTech, LLC
C/O Rachel Kubanda
711 Louisiana Street
Suite 1800
Houston, TX 77002

The following recipients may be/have been bypassed for notice due to an undeliverable (u) or duplicate (d) address.

(u) KLEIN INDEPENDENT SCHOOL DISTRICT

(u) Official Committee of Unsecured Creditors

(d) Alliance Energy Partners, LLC
20008 Champions Forest Dr., Suite 1203
Spring, TX 77379-8697

(d)Alliance Farm and Ranch, LLC

(u)Dustin Etter

5450 Honea Egypt Rd.

Montgomery, TX 77316-2364

End of Label Matrix

Mailable recipients 15

Bypassed recipients 6

Total 21

Label Matrix for local noticing

0541-4

Case 25-31937

Southern District of Texas

Houston

Wed May 21 14:08:32 CDT 2025

4
 United States Bankruptcy Court
 PO Box 61010
 Houston, TX 77208-1010

Alliance Energy Partners, LLC
 20008 Champions Forest Dr.
 Suite 1203
 Spring, TX 77379-8697

IAE International, Inc
 co Renshaw PC
 2900 Weslayan
 Suite 360
 Houston, TX 77027-5132

405 Technology Solutions
 PO Box 8433
 Moore, OK 73153-8433

ADM Machine Shop
 14217 HWY TX-105
 Conroe, TX 77306-5356

AI Driller Inc
 1801 W Wall St
 Midland, TX 79701-6531

ASAP Thread Protecters
 Jose Carrasco
 Houston, TX 77066

Adobe Oilfield Services, Ltd
 705 W. Hillmont
 Odessa, TX 79764-1931

All-American Trucking
 P.O. Box 270568
 Houston, TX 77277-0568

Alliance Drilling Tools, LLC
 PO Box 1503
 Evanston, WY 82931-1503

Alliance Farm and Ranch
 5450 Honea Egypt Rd.
 Montgomery, TX 77316-2364

ArcoTech Drilling Solutions
 REME Technologies dba Arcotech
 PO Box 916
 Broussard, LA 70518-0916

Arrington Directional LLC
 Camp Arrington
 2029 Eagle View Dr.
 Navasota, TX 77868-3951

Bench Tree Rentals, LLC
 2933 E. Davis
 Conroe, TX 77301-7216

Benjamin W. Kadden
 Lugenbuhl, Wheaton, Peck, Rankin
 601 Poydras, Suite 2775
 New Orleans, LA 70130-6041

Big H Transport LLC
 PO Box 215
 Dobbin, TX 77333-0215

Black Diamond
 15425 North Freeway Suite 350
 Houston, TX 77090-6016

Black Diamond Oilfield Rentals, LLC
 15425 North Freeway Suite 350
 Houston, TX 77090-6016

Brent William Smith
 16516 El Camino Real, Suite 406
 Houston, TX 77062-5723

Brittany Lopez CPA PC
 7 Grogans Park, Suite 10
 The Woodlands, TX 77380-2402

Cavare Inc
 Bill Beattie
 12066 FM 3083 Rd
 Conroe, TX 77301-6104

Conroe Welding Supply Inc
 415 South Frazier
 Conroe, TX 77301-5098

DAC Electrical Services, LLC
 7926 Adcock Acres Dr.
 Conroe, TX 77303-4014

DAVM, LLC
 12419 Bagwell Rd
 Willis, TX 77378-4705

DIG
 PO Box 916
 Broussard, LA 70518-0916

Directional Manufacturing and Supply
 1098 Marcon Dr
 Lafayette, LA 70507

Discovery Downhole Services
 1855 Skyview Dr.
 Casper, WY 82601-9641

Downhole Works LLC
 28723 Shirley Court
 Magnolia, TX 77355-5613

Drakewell LLC
 3324 NW 135TH ST
 Oklahoma City, OK 73120-4054

Dura Coatings
13920 South Meridian
Oklahoma City, OK 73173-8804

Dustin Etter
c/o Noah E. W. Meek
Irelan McDaniel, PLLC
2520 Caroline, 2nd Floor
Houston, TX 77004-1000

Dyna-Drill
23400 Colonial Parkway
Katy, TX 77493-3598

Dyna-Drill Technologies LLC
23400 Colonial Parkway
Katy, TX 77493-3598

DynoMax Drilling Tools USA, Inc.
2830 Farrell Road
Houston, TX 77073-4106

FT Machine LLC
820 Turney Dr
Houston, TX 77038-3922

Ferretville Investments LLC
20008 Champion Forest Dr., Suite 1204
Spring, TX 77379-8697

Gator Technologies
2017 Traders Ridge Drive
Conroe, TX 77301-2153

GeoGuidance Drilling Services
P.O. Box 42647
Bakersfield, CA 93384-2647

Gordon Technologies LLC
PO Box 1486
Scott, LA 70583-1486

IAE International, Inc. d/b/a Sniper
13300 Stonefield Dr.
Houston, TX 77014-2923

IMECH - Innovative Mech. Solutions, LLC
2418 Greens Rd
Houston, TX 77032-1332

InMotion Technical Support
P.O. Box 770391
Houston, TX 77215-0391

Innova Drilling and Intervention
3050 Post Oak Blvd Suite 510
Houston, TX 77056-6512

J & B Breakout Unit Repairs LLC
PO Box 604
Conroe, TX 77305-0604

Justin Renshaw
2900 Weslayan, Suite 360
Houston, TX 77027-5132

Keystone Manufacturing
12243 Northwoods Park Drive Suite A
Houston, TX 77041

Kyle V. Littlefield
32084 Ponderosa Way
Evergreen, CO 80439-6645

LMJ Solutions Oilfield Services
2700 Industrial Ln
Conroe, TX 77301-4072

Lion Inspection Services
3002 Farrell Rd
Houston, TX 77073-3007

Lone Star Trucking
P.O. Box 872
Odessa, TX 79760-0872

NOS
2800 Broadway, Suite C-709
Pearland, TX 77581-9502

On Point Logistics
15814 Champion Forest Dr. Suite 1083
Spring, TX 77379-7141

Pegasus NGV Trucking
PO Box 689
Broussard, LA 70518-0689

Performance Power Inc.
P.O. Box 1608
Casper, WY 82602-1608

Platinum Transport Service
3526 Azalea Sands Dr.
Spring, TX 77386-2926

Pmax Energy Services Inc
16655-2 Telge Road
Cypress, TX 77429-1387

Rig Runner
24955 I45 North
The Woodlands, TX 77380

Schumacher-Dixie, LLC
5610 Polk Street
Houston, TX 77023-2106

Spira Systems Inc
16518 Aldine Westfield Road Suite A
Houston, TX 77032-1363

Steel River Manufacturing LLC
18300 Strack Drive Suite 800
Spring, TX 77379-8798

Surface Resistance Technologies LLC
2998 Old Highway 105 E
Conroe, TX 77301-6452

Tellez Machine
606 Midland Dr
Houston, TX 77037-1227

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1113 Vine St., Suite 240
Houston, TX 77002-1044

Timothy W. Strickland
Kean Miller, LLC
711 Louisiana St., Suite 1800
Houston, TX 77002-2832

Triumph Express
5805 Archduke Dr.
Houston, TX 77032

Truist Bank, Support Services
P.O. Box 85092
Richmond, VA 23286-0001

Turnazontal LLC
8514 Hamer Ranch
San Antonio, TX 78254-4526

US Trustee
Office of the US Trustee
515 Rusk Ave
Ste 3516
Houston, TX 77002-2604

United Machine Works
P O Box 525
New Waverly, TX 77358-0525

United States Trustee's Office
515 Rusk St., Suite 3516
Houston, TX 77002-2604

Viking Power Technologies
5203 Aeropark Dr.
Houston, TX 77032-4039

Viper Energy Technology
16623 Aldine Westfield Rd.
Houston, TX 77032-1351

William Hotze
Kane Russell Coleman Logan, PC
5151 San Felipe, 8th Floor
Houston, TX 77056-3607

Workrise - Rusco Operating, LLC
111 Congress Ave. Suite 1300
Austin, TX 78701-4092

Xela Media
851 Fisher Street unit B
Houston, TX 77018-5338

Dustin Etter
2520 Caroline, 2nd Floor
Houston, TX 77004-1000

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Houston, TX 77002-1044

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(d)Alliance Energy Partners, LLC
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(u)Alliance Energy Partners, LLC20008 Champio
United States Trustee's Office515 R
405 Technology SolutionsPO Box 8433M
ADM Machine Shop14217 HWY TX-105Conr
Adobe Oilfield Services, Ltd705 W. Hill
AI Driller Inc1801 W Wall StMidland

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End of Label Matrix	
Mailable recipients	80
Bypassed recipients	6
Total	86